

## **EXHIBIT 11**

United State District Court  
Southern District of New York

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The Satanic Temple, Inc.

Plaintiff,

1:22-CV-01343-MKV

v.

Newsweek Digital, LLC,

Defendant.

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DEPOSITION OF PAUL MILLIRONS

DECEMBER 7, 2023

10:00 a.m.

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File # MW 6345272

COURT REPORTER: Christina DeGrande

1 Q. Those are -- originally, those were your words,  
2 correct?

3 A. Yes.

4 Q. Okay. Periodically, I'm going to refer to this  
5 statement as "The article statement." Do you  
6 understand that?

7 A. Yes.

8 Q. And periodically, I'm going to refer to the article  
9 as either "The article" or "The subject article."  
10 Do you understand that as well?

11 A. I do.

12 Q. Great. All right. Drawing your attention to this  
13 phrase, "Sexual abuse," in context of your quote to  
14 -- well, let's back up a little bit. Do you  
15 remember the name of author who wrote this article?

16 A. Julia Duin.

17 Q. Okay. In context of your quote to Julia, what did  
18 you mean by, "Sexual abuse"?

19 A. To my understanding, unwanted sexual advances or  
20 contact.

21 Q. Okay. And to be clear, that's what this means here  
22 in this sentence, not just generally in your mind  
23 what sexual abuse means to you; is that correct?

24 A. Correct.

25 Q. Okay. And how about this: "Being covered up in

1                   ways that were more than anecdotal"?

2           A.    I'm sorry.  What do you mean?  What about it?

3           Q.    I'm -- I'm asking what that -- what that meant in  
4                   your mind when you wrote this quote.

5           A.    Okay.

6           Q.    So what did you mean when you --

7           A.    The context was that Julia had asked what were some  
8                   -- what were -- what were some of the reasons that I  
9                   was not involved with TST or had -- had left the  
10                  organization, and that was part of a list of things  
11                  that concerned me.  When I say, "Covered up in ways  
12                  that are more anecdotal," I'm referring specifically  
13                  to observed behavior on social media by people I  
14                  understand to be leaders in TST.  I think there were  
15                  chapters at the time.

16          Q.    So is it -- is it accurate to say that you  
17                  personally witnessed this sexual abuse?

18          A.    No.

19          Q.    Okay.  So you didn't personally witness any sexual  
20                  abuse?

21          A.    No.

22          Q.    What about this coverup?  You -- is it accurate to  
23                  say you personally observed the coverup?

24          A.    I observed behavior that I thought would -- it was  
25                  suspicious in the context of allegations that were

1                   these claims to you?

2           A.    I know of three instances in which allegations were  
3               being made.  In two of them, there was corresponding  
4               behavior on behalf TST membership or leadership that  
5               went veracity to me to the claims that were being  
6               made.

7           Q.    Okay.  You say there are three instances that you  
8               have in mind.  Did you personally observe any of the  
9               three?

10          A.    The subject of the allegations?

11          Q.    Correct.

12          A.    No.

13          Q.    Okay.  Did you personally observe any coverup as to  
14               any of these three subject allegations?

15          A.    I observed behavior that, to me, sug- -- was not  
16               what I would consider to be ethical or responsible  
17               or in response to these sort of accusations.  That,  
18               to me, lent more credibility to those claims.

19          Q.    In terms of -- in terms of coverup, though, did you  
20               observe any coverup?

21          A.    Well, I think if someone came forward with a claim  
22               of being sexually assaulted, for example, and  
23               organizational leadership's response was to remove  
24               -- immediately remove that person and anyone  
25               connected to them or who might be supporting them,

1 purpose?

2 MS. TESORIERO: Objection to form.

3 THE WITNESS: I -- I don't actually  
4 know what their -- their purp- -- their, you  
5 know, actual purpose is, no.

6 MR. KEZHAYA: Okay. That concludes my  
7 -- that concludes my questioning. Pass the  
8 witness.

9 MS. TESORIERO: All right.

10

11 CROSS-EXAMINATION

12 BY MS. TESORIERO:

13 Q. Mr. Strange, as I said earlier, my name is Sara  
14 Tesoriero. I am counsel for the defendant in this  
15 case, Newsweek. I just have a couple follow-up  
16 questions for you. When you were speaking with  
17 plaintiff's counsel, you mentioned three instances  
18 of sexual abuse that you had in mind when you  
19 mentioned accounts that were more than anecdotal.  
20 Would you just briefly describe what those three  
21 incidents entailed?

22 MR. KEZHAYA: Object to hearsay.

23 Go ahead and answer.

24 THE WITNESS: Okay. The first case was  
25 -- or -- or I'm sorry. These are not

1                   chronological. One case was the case at the  
2                   heart of the Washington Chapter issue. My  
3                   understanding is that someone came forward  
4                   with an allegation, and then they were  
5                   immediately removed and as well as anyone it  
6                   was just perceived might support them.

7                   The second was a young woman from, I  
8                   believe, the Austin TST Chapter at the time.  
9                   Her name was Kylie Scenario, and very  
10                  similarly, my understanding was that she had  
11                  made an allegation and was immediately  
12                  removed, possibly along with other  
13                  supporters.

14                 The third instance is a personal friend  
15                 who confided in me something that happened  
16                 to her at a -- at a party.

17                 BY MS. TESORIERO:

18                 Q. And just to confirm, was your friend a member of the  
19                 Satanic Temple at the time?

20                 A. I don't know.

21                 Q. But was the person she accused a member of the  
22                 Satanic Temple at the time?

23                 A. Yes.

24                 Q. Okay. Thank you. And your friend, are you aware of  
25                 what -- did she -- do you know what happened after